



**CONESTOGA-ROVERS
& ASSOCIATES**

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April 2, 2009

Reference No. 054633-10

Mr. Steven Faryan
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY - REGION 5
77 West Jackson Boulevard
Mail Code SE-5J
Chicago, IL 60604-3507

Dear Mr. Faryan:

Re: Response to USEPA Comments
QAPP and SAMP
20 Jefferson Avenue
Elgin, Illinois

Conestoga-Rovers & Associates (CRA), on behalf of Jefferson Yard Removal Action Group (Group), submits the following responses to comments received from the United States Environmental Protection Agency (USEPA) in an email dated March 18, 2009, regarding the Sampling, Analysis, and Monitoring Plan (SAMP) and the Quality Assurance Project Plan (QAPP) for the 20 Jefferson Avenue property in Elgin, Illinois (Site). The SAMP and QAPP were submitted to USEPA via email on February 25, 2009.

USEPA's comments are paraphrased below, followed by our responses.

SAMP:

The SAMP did not state that confirmatory soil samples were planned to be collected, nor whether the samples would be grab-type or composite samples.

Response:

Section 6.0 of the SAMP has been revised to specify that confirmatory sidewall and bottom soil samples will be collected and analyzed for PCBs, total lead, total cadmium, TCLP lead, and TCLP cadmium following the soil excavation activities. The confirmatory soil samples will be discrete grab samples.

Figure 6.1 has also been added to the SAMP indicating the approximate locations of the planned confirmatory sampling points.

QAPP:

The QAPP did not state that confirmatory soil samples were planned to be collected, nor how many confirmatory samples were planned to be collected.



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Response:

Worksheets 10, 11, 17, and 30 have been revised to specify that confirmatory sidewall and bottom soil samples will be collected and analyzed for PCBs, total lead, total cadmium, TCLP lead, and TCLP cadmium following the soil excavation activities. Worksheet 30 has been revised to also reflect that approximately 20 confirmatory soil samples will be collected and that dioxin sampling will not be conducted as part of the confirmatory sampling program. Analytical protocols for dioxin analysis are included in the QAPP for waste profiling purposes only.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

Ron Frehner

SRV/sb/4

Enc.

c.c.: Alan Bielawski; Sidley Austin